



September 23, 2022

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Filed Via ECF

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

**Re: *Network-1 Technologies, Inc. v. Google LLC, et al.*,
Case Nos. 1:14-cv-2396-PGG & 1:14-cv-9558-PGG**

Dear Judge Gardephe:

I write on behalf of Plaintiff Network-1 Technologies, Inc. ("Network-1") to request leave to file under seal several documents that will be submitted in connection with Network-1's Supplemental Brief in Opposition to Google's Motion for Summary Judgment. Specifically, Network-1 requests leave to file undredacted copies of Network-1's Brief, and accompanying Exhibits 86, 87, and 88 under seal. Each of these documents contains material and information designated by Google under the Protective Order in these matters. Because the relevant information is Google's information, Network-1 requests that the Court permit filing of these documents under seal. Google has indicated that, pursuant to the Court's Individual Practices, Google will submit a letter explaining its position on sealing by September 26, and provide Network-1 with redactions for any portions of these materials Google requests to remain sealed by that time as well. Network-1 will then file a public, redacted version of its submission.

MEMO ENDORSED: : The application is granted. The Clerk of Court is directed to terminate the motions pending at Dkt. No. 273 in 14 Civ. 2396 and Dkt. No. 209 in 14 Civ. 9558.

SO ORDERED.

Paul G. Gardephe
United States District Judge

Date: September 21, 2023



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Dated: September 23, 2022

Respectfully submitted,

RUSS, AUGUST & KABAT

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